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AO 91 (Rev. 11/11) Criminal Complaint

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Michael Johnson

Case: 2:19-mj-30345

Assigned To : Unassigned

Assign. Date : 6/18/2019

Description: CMP USA v. JOHNSON (SO)

## CRIMINAL COMPLAINT

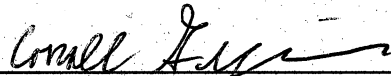
I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 18, 2019 in the county of Wayne in theEastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)	Possession with intent to distribute 50 grams or more of methamphetamine
18 U.S.C. § 922(g)	Felon in possession of a firearm
18 U.S.C. § 924(c)	Possession a firearm in furtherance of a drug trafficking crime

This criminal complaint is based on these facts:

That on or about June 18, 2019, in the Eastern District of Michigan, Michael Allen Johnson knowingly and intentionally possessed with intent to distribute 50 grams or more of methamphetamine in violation of 21 U.S.C. § 841(a), possessed a firearm after being convicted of a felony offense in violation of 18 U.S.C. § 922(g), and possessed a firearm in furtherance of a drug trafficking crime in violation of 18 U.S.C. § 924(c).

☒ Continued on the attached sheet.

Complainant's signature

Conall Guckin, Special Agent, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: June 18, 2019City and state: Detroit, MI

Judge's signature

Elizabeth Stafford, U.S. Magistrate Judge

Printed name and title

MONA K. MAJZOUB

**AFFIDAVIT**

1. I am a Special Agent [hereafter "SA"] with the Drug Enforcement Administration [hereafter "DEA"] assigned to the Detroit Field Division, Flint Resident Office, which is located in Genesee County and the Eastern District of Michigan. As such, I am a Federal law enforcement officer within the meaning of Federal Rule of Criminal Rule 41(a)(2)(c), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for federal criminal offenses and make requests for warrants. I have been so empowered since September 13, 2018. I have received specialized training on the subject of drug trafficking and money laundering from the DEA. I have received specialized training and have participated in the instillation and monitoring of GPS tracking devices. I have additional experience within the law enforcement field I was employed by the Avalon Police Department, Haddon Heights Police Department and the Camden County Sheriff's Department for approximately two and a half years. Additionally I have worked as a Criminal Analyst for CRA, Inc. affiliated with the Camden County Metro Police Department for approximately one year. In addition to training received from the DEA, your affiant has been trained by the Cape May County Police Academy, Cape May, New Jersey. I presently am involved in investigating covert and overt drug trafficking complaints. I work in conjunction with other

federal and local police agencies investigating illegal trafficking of controlled substances and the collection and trafficking of related drug proceeds throughout the United States of America and abroad.

2. The information included in this affidavit is provided for the limited purpose of establishing probable cause that Michael JOHNSON knowingly and intentionally possessed with intent to distribute 50 grams or more of methamphetamine in violation of 21 U.S.C. § 841(a), possessed a firearm after being convicted of a felony offense in violation of 18 U.S.C. § 922(g), and possessed a firearm in furtherance of a drug trafficking crime in violation of 18 U.S.C. § 924(c), and therefore it does not contain all of the facts known to me.

3. On June 18, 2019, the DEA executed a search warrant at JOHNSON's residence, 3090 Ewald Circle, Detroit, MI 48238. During the search warrant investigators located 2 ounces of crystal methamphetamine and 4 guns located in the residence. JOHNSON was also located inside the residence and detained for officer's safety.

4. The 2 ounces of suspected crystal methamphetamine was located in the kitchen pantry. I know, based upon my training and experience, and through discussions with other law enforcement officers, that 2 ounces of crystal methamphetamine is for distribution and not personal use.

5. One firearm was located by the front door on an end table and was loaded with 11 bullets. The make and model was a Taurus PT 145 PRO .45 Caliber. It should be noted that serial number was grinded off. Another firearm was located on top of the fridge in the kitchen and was loaded with 23 bullets. The make and model was a Zastava Serbia 7.62X39, serial number M92PV060281. A third firearm was located in the southeast bedroom (JOHNSON's bedroom) end table and was loaded with 12 bullets. The make and model was an American Tactical Fatboy .45 Caliber, serial number FBLW100643. A fourth firearm was also located in JOHNSON's bedroom on the same end table and was loaded with 11 bullets. The make and model was a Smith & Weston .40 Caliber, serial number was THB1969. I know, based upon my training and experience, and through discussions with other law enforcement officers, that it is common for drug dealers to keep their guns close to their product and nearby for easy access in order to protect their product and I believe Johnson possessed the firearms in furtherance of a drug trafficking crime.

6. I spoke with SA John Wickwire of the Bureau of Alcohol, Tobacco, Firearms and Explosives (AFT) who is an Interstate Nexus expert and advised me that all four guns were manufactured outside the state of Michigan and therefore affected interstate commerce.


7. Investigators located a real-estate deed document with the address of 3090 Ewald Circle, Detroit, MI 48238 and JOHNSON's name on it inside the residence

8. JOHNSON was subsequently arrested and admitted to being a convicted felon. JOHNSON stated post-*Miranda*, "I thought I could have guns inside the house and just not take them outside." JOHNSON also admitted that the 2 ounces of crystal meth was his. JOHNSON stated that "ICE" in the house was his. I know, based upon my training and experience, and through discussions with other law enforcement officers, that the word "ICE" is a street term for crystal methamphetamine.

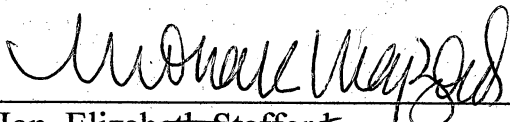
9. A field test of the suspected crystal methamphetamine tested positive for the presence of crystal methamphetamine.

10. A review of JOHNSON's criminal history reflects that he has prior felony convictions. In 2008, JOHNSON was convicted in Wayne County Michigan for Breaking & Entering – A Building with Intent. In 2009, JOHNSON was convicted in Washtenaw County for Armed Robbery, Weapons Felony Firearm and Weapons – Firearms – Possession by Felon. Both of these are felony offenses for which over one year of imprisonment is a possible sentence and prohibit JOHNSON from lawfully possessing a firearm.

11. Based on the above-described information, there is probable cause to believe that beginning on a date unknown and continuing until on or about June 18, 2019, Michael JOHNSON possessed with intent to distribute crystal methamphetamine, a Schedule II controlled substance, in violation of Title 21 U.S.C. § 841(a)(1), and possessed firearms in violation of Title 18 U.S.C. § 924 (c), and Title 18 U.S.C. § 922 (g)(1).

  
Conall Guckin, Special Agent  
Drug Enforcement Administration

Subscribed and sworn to before me  
this 18<sup>th</sup> day of June, 2019. JUN 18 2019

  
Hon. Elizabeth Stafford  
United States Magistrate Judge  
MONA K. MAJZOUB